

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA

MONTGOMERY, et al.,

*Plaintiffs,*

v.

RIDER UNIVERSITY, et al.,

*Defendants.*

**CIVIL ACTION NO.  
2:14-cv-06366**

Hon. Paul S. Diamond  
United States District Judge

**STIPULATION OF TIME TO ANSWER, PLEAD, OR OTHERWISE MOVE**

Plaintiffs Erin Montgomery and Fred Montgomery (“Plaintiffs”) and Defendant American Federation of State, County and Municipal Employees, AFL-CIO (“AFSCME International”), by and through their undersigned attorneys, hereby request that the Court approve their stipulation to extend by thirty (30) days the period for Defendant AFSCME International to answer, plead, or otherwise move in response to the Complaint. No prior extension of time to respond to the Complaint has been granted. Accordingly, Defendant AFSCME International shall respond to the Complaint by January 14, 2014.<sup>1</sup>

Respectfully submitted,

/s/ Matthew B. Weisberg\*

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Respectfully submitted,

/s/ Matthew Stark Blumin

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<sup>1</sup> AFSCME International was served with the Complaint by mail on November 20, 2014. Accordingly, absent this stipulation, AFSCME International would have until Monday, December 15 to respond to the Complaint by operation of Federal Rules of Civil Procedure 12, 6(d), 5(b)(2)(C), and 6(a)(1)(C).